

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
)	Case No. 25-10068 (CTG)
)	
JOANN INC., <i>et al.</i> , ¹)	(Jointly Administered)
)	
Debtors.)	Hearing Date: April 3, 2025, at 1:00 p.m. (ET)
)	Objection Deadline: March 27, 2025, at 4:00 p.m. (ET)

**NOTICE OF MOTION OF JONES LANG LASALLE AMERICAS, INC. FOR ENTRY
OF AN ORDER: (I) COMPELLING THE ASSUMPTION OR REJECTION OF A
CERTAIN EXECUTORY CONTRACT PURSUANT TO 11 U.S.C. §§ 105(a) AND 365 OF
THE UNITED STATES BANKRUPTCY CODE AND FEDERAL RULES OF
BANKRUPTCY PROCEDURE 6006 AND 9014; (II) ALLOWING AND COMPELLING
PAYMENT OF AN ADMINISTRATIVE EXPENSE CLAIM UNDER 11 U.S.C. § 503(b);
AND (III) GRANTING SUCH OTHER AND FURTHER RELIEF
AS THE COURT MAY DEEM JUST AND PROPER**

PLEASE TAKE NOTICE that on March 20, 2025, Jones Lang LaSalle Americas, Inc. (“JLL”) filed the Motion of JLL for Entry of an Order (I) Compelling the Assumption or Rejection of a Certain Executory Contract Pursuant to 11 U.S.C. §§ 105(a) and 365 of the United States Bankruptcy Code and Federal Rules of Bankruptcy Procedure 6006 and 9014; (II) Allowing and Compelling Payment of an Administrative Expense Claim Under 11 U.S.C. § 503(b); and (III) Granting Such Other and Further Relief as the Court May Deem Just and Proper (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion, must be filed on or before March 27, 2025, at 4:00 p.m. (Eastern Time) (the “Objection Deadline”) with the Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that at the same time, you must serve a copy of the response on the undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on April 3, 2025, at 1:00 p.m. (Eastern Time) before the Honorable Craig T. Goldblatt, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Third Floor, Court Room 7, Wilmington, Delaware 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027) (together the “Debtors”). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Respectfully submitted,

GELLERT SEITZ BUSENKELL & BROWN, LLC

Dated: March 20, 2025

/s/ Amy D. Brown

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